

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

JOHN DOE

Plaintiff

vs.

Civil 8:16-cv-03314-PX

WALLACE LOH, et al.

Defendants

MOTION TO SEAL

JOHN DOE, Plaintiff (under a pseudonym), hereby files this Motion to Seal certain pleadings, motions, documents, exhibits filed in this case, pursuant to Local Rule 105(11), and alleges as follows:

1. Plaintiff has filed, coincident with the filing of this Motion, a Motion to Proceed Anonymously, under a pseudonym, John Doe, that seeks to protect the identity of the Plaintiff and non-parties involved in the factual scenario giving rise to the Complaint. Plaintiff incorporates by reference all of the arguments contained in that Motion, as to the reasons for sealing and keeping from public viewing documents, exhibits, motions, and other pleadings that would reveal the identity of the parties and non-parties whose identity the Plaintiff seeks to shield. This includes the Motion to Proceed Anonymously, which Motion reveals the names of the parties.

2. In addition, Plaintiff seeks to seal Docket #1, the Redacted Complaint, which, erroneously included some information that may have revealed the identity of the Plaintiff. A “Redacted” Redacted Complaint has been filed under Docket #6. Similarly, Plaintiff seeks to seal “Redacted Exhibit 7, filed originally under Docket #2, which erroneously included information that may have revealed the identity of the Plaintiff. A Properly “Redacted”

Redacted Exhibit 7 has been filed under Docket #6, The Clerk has temporarily sealed these documents at the Plaintiff's request pending resolution of this Motion. Plaintiff seeks to substitute the properly redacted documents for the original documents that revealed identity information. Upon substitution, those documents, in properly redacted form, could be unsealed.

3. Local Rule 105(11) requires that the moving party provide an explanation why alternatives to sealing would not provide adequate protection. In accordance thereto, Plaintiff submits that filing redacted documents that allows the public to understand the gist of the documents, pleadings, motions, and exhibits, while protecting the identify of the parties, is a sufficient alternative to sealing, and that allowing the Plaintiff to substitute pseudonyms and initials in lieu of the actual naming of parties and non-party participants provides sufficient protection. Thus, Plaintiff seeks only to seal documents that identify, or could lead a third party to identify the parties whose identity is sought to be shielded herein.

WHEREFORE, Plaintiff prays:

A. That the Court Order the Clerk to substitute the properly "Redacted Complaint" filed in Docket #6, for the Complaitn (Docket #1); and that the Court Order the Clerk to substitute the properly "Redacted Exhibit 7" for Exhibit 7 filed as an attachment to Docket #2, and that these properly redacted documents remain unsealed;

B. That, in accordance with the Plaintiff's Motion to Proceed Anonymously, that all parties be ordered to file redacted documents that keep the identify of the Plaintiff, his accuser, and other non-party witnesses to the events recounted in the Complaint from being made public, and that non-redacted copies of said documents be filed under seal.

C. That all pleadings, motions, and other papers filed and to be filed in this case refer to the Plaintiff by a pseudonym, John Doe, his accuser as Jane Roe, and other non-party witnesses

by their initials, and that any pleadings, motions, or documents that reveal the identity of said persons be filed under seal.

Respectfully submitted,

CLARK & STEINHORN, LLC

/s/ Robert V. Clark

By: Robert V. Clark Fed #02738

9101 Cherry Lane, Ste. 204

Laurel, MD 20708

(301) 317-1002

rvcj@verizon.net

Attorney for Plaintiff